

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
vs.)	CASE NO: CV 122-007
)	
FUNDS SEIZED FROM WELLS FARGO)	
ACCTS. ENDING IN 3693, 1970, 2039 AND)	
VENMO/PAY PAL, ENDING IN 2280)	
_____)	
)	
CONWAY JAMES RHINEHART)	
Claimant)	
_____)	

ANSWER

COMES NOW, Conway James Rhinehart, Claimant by and through his attorney of record, Jeffrey E. Johnston, and files this, his Answer in the above case, showing the Court as follows:

1)

The Claimant hereby admits the allegations contained in paragraph 1 of the Verified Complaint.

2)

The Claimant hereby admits the allegations contained in paragraph 2 of the Verified Complaint.

3)

The Claimant hereby admits the allegations contained in paragraph 3 of the Verified Complaint

4.

The Claimant hereby admits the allegations contained in paragraph 4 of the Verified Complaint

5.

The Claimant hereby admits the allegations contained in paragraph 5 of the Verified Complaint

6.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 6 of the Verified Complaint.

7.

The Claimant hereby denies the allegations contained in paragraph 7 of the Verified Complaint.

8.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 8 of the Verified Complaint.

9.

The Claimant hereby denies the allegations contained in paragraph 9 of the Verified Complaint.

10.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 10 of the Verified Complaint.

11.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 11 of the Verified Complaint.

12.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 12 of the Verified Complaint.

13.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 13 of the Verified Complaint.

14.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 14 of the Verified Complaint.

15.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 15 of the Verified Complaint.

16.

The Claimant is without sufficient knowledge to either admit or deny the allegations of paragraph 16 of the Verified Complaint.

17.

The Claimant hereby denies the allegations contained in paragraph 17 of the Verified Complaint.

18.

The Claimant hereby denies the allegations contained in paragraph 18 of the Verified Complaint.

19.

The Claimant hereby denies the allegations contained in paragraph 19 of the Verified Complaint.

WHEREFORE, Claimant respectfully prays for the following relief:

- a) That the Court deny the Plaintiff's claim for forfeiture of the Defendant currency;
- b) That the Defendant currency be returned to the Claimant;
- c) That the Court enter such additional relief as is deemed just and proper.

Respectfully submitted, this 5th day of April, 2022.

/s/ Jeffrey Johnston
Jeffrey E. Johnston
Attorney for Plaintiff
Georgia Bar No. 397157
jeff@jeffreyjohnstonlaw.com

JEFFREY E. JOHNSTON, P.C.
601 North Belair Square, Suite 10
Evans, Georgia 30809
Telephone: (706) 869-8171
Facsimile: (706) 496-2689

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all parties in this case in accordance with the notice of electronic filing (“NEF”) which is generated as a result of electronic filing in this Court.

This 5th day of April, 2022.

/s/ Jeffrey Johnston
Jeffrey E. Johnston
Attorney for Plaintiff
Georgia Bar No. 397157
jeff@jeffreyjohnstonlaw.com

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